

1 The Honorable Ricardo S. Martinez
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5 UNITED STATES DISTRICT COURT
6 WESTERN DISTRICT OF WASHINGTON
7 AT SEATTLE

8 TREVOR KEVIN BAYLIS,

9 Plaintiff,

10 v.

11 VALVE CORPORATION,

12 Defendant.

Case No. 2:23-cv-01653-RSM

PLAINTIFF

TREVOR KEVIN BAYLIS

**REQUEST FOR JUDICIAL
NOTICE 2**

13 Filed: 27th March 2024

14 **I. TO THE HONORABLE RICARDO S. MARTINEZ, UNITED STATES
15 DISTRICT COURT JUDGE, DEFENDANTS AND THEIR ATTORNEYS OF
16 RECORD HEREIN:**

17 **PLEASE TAKE NOTICE:** In support of their Motion, Second Amended Complaint
18 (“FAC”) Dkt. 25. Trevor Kevin Baylis (“Plaintiff”) respectfully requests, pursuant to Fed.
19 R. Evid.201(b)(2), Fed. R. Evid.201(c) to take judicial notice of the following, adjudicative
20 facts, links and records.

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22 A. Under Rule 201, facts appropriate for judicial notice are those that are
23 “not subject to reasonable dispute” in that they (2) are “capable of accurate and ready
24 determination by resort to sources whose accuracy cannot be reasonably questioned.”

1 Federal rules of evidence 201(b). The court may take judicial notice of its own records
2 and other court cases.

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4 **1. A copyrightable work must have a human author, a “natural person”, as**
5 **an originator with the capacity for intellectual, creative, or artistic labor.**

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7 **A. THALER v. PERLMUTTER (2023)**

8 **United States District Court, District of Columbia.**

9 **Stephen THALER, Plaintiff, v. Shira PERLMUTTER, Register of Copyrights**
10 **and Director of the United States Copyright Office, et al., Defendants.**

11 **Case 1:22-cv-01564-BAH Document 24 Filed 08/18/23**

12 Thaler v. Perlmutter, Civil Action 22-1564 (BAH), 9 (D.D.C. Aug. 18, 2023)
13 (““Author,” in its relevant sense, means “one that is the source of some form of intellectual
14 or creative work,” “[t]he creator of an artistic work; a painter, photographer, filmmaker,
etc.” Author, MERRIAM-WEBSTER UNABRIDGED DICTIONARY, <https://unabridged.merriam-webster.com/unabridged/author> (last visited Aug. 18, 2023); Author, OXFORD
15 ENGLISH DICTIONARY, <https://www.oed.com/dictionary/authorn> (last visited Aug. 10,
2023). By its plain text, the 1976 Act thus requires a copyrightable work to have an originator
16 with the capacity for intellectual, creative, or artistic labor. Must that originator be a human
being to claim copyright protection? The answer is yes.””)

17 **<https://casetext.com/case/thaler-v-perlmutter>**

II. CONCLUSION

This Request For Judicial Notice is respectively made in support of Plaintiff's Motion, Second Amended Complaint, Dkt. 25.

I hereby certify that, to the best of my knowledge, the provided information is true and accurate.

27th March 2024

Trevor Kevin Baylis

Two Bay

Jankanraitti

Tampere 33560, FINLAND

Please note: Plaintiff is dyslexic. Thus written documents such as this may have minor accidental spelling and or grammatical errors. Such things should not be seen as cause to prejudice the author of this document.

**CERTIFICATE OF SERVICE FORM
FOR ELECTRONIC FILINGS**

I hereby certify that on 27th March 2024 I electronically filed the foregoing document

with the United States District Court

Western District of Washington at Seattle by using the

CM/ECF system. I certify that the following parties or their counsel of record are registered as ECF Filers and that they will be served by the

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Dated: 27th March 2024

Tessa Baylin

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